REMARKS

Claims 1-15, 17-32, and 34-46 are pending in the present application.

Claims 16 and 33 are canceled with this amendment.

Claims 1, 11, 17, 24, and 35 are amended to more particularly point out and distinctly claim the invention.

Claim 17 is amended to change its dependency from canceled claim 16 to independent claim 1.

Claim 11 was objected to because the word "on" in line 2 is a typographical error. The word "on" should be the word "or". Accordingly, Applicants have amended claim 11 to recite "or" in line 2.

Claim 11 also was objected to under 37 CFR § 1.75(c) as allegedly being of improper dependent form for failing to further limit the subject matter of a previous claim.

Claim 11 also has been amended to recite the word "further" in line 1 before the word "comprising", which points out the adhesion promotion composition of claim 1 also includes an oxidizer and a corrosion inhibitor in addition to the acids.

Applicants respectfully request withdrawal of the objections to claim 11.

Claims 1-4, 6-10, 13 and 22-23 are rejected under 35 U.S.C. §102(b) as allegedly anticipated by US 5,885,436 to Ameen. Applicants respectfully traverse this rejection.

Independent claim 1 is amended to recite that the adhesion promotion composition includes a source of halide ions. Ameen does not teach or suggest such an adhesion promotion composition. Accordingly, Ameen does not anticipate amended claim 1.

Since claims 2-4, 6-10 and 22-23 depend directly or indirectly from amended claim 1, Ameen also does not anticipate the dependent claims.

Applicants respectfully request withdrawal of the rejection of claims 1-4, 6-10, 13 and 22-23 under 35 U.S.C. §102(b) as allegedly anticipated by US 5,885,436 to Ameen.

Claims 1-3, 7-15, 18-26, 30-32, 34-37 and 41-46 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over US 6,054,061 to Bayes in view of US 5,861,076 to Adlam et al. Applicants respectfully traverse this rejection.

Claims 1, 24, and 35 have been amended to recite that the adhesion promotion composition includes a source of halide ions. Bayes alone or in combination with Adlam et al. does not teach or suggest such an adhesion promotion composition. Accordingly, the subject matter of claims 1, 24, and 35 would not have been obvious in view of the applied documents.

Since claims 2-3, 7-15, 18-23, 25-26, 30-32, 34, 36-37 and 41-46 depend directly or indirectly from one of the three independent claims, the dependent claims also would not have been obvious in view of the applied documents.

Applicants respectfully request withdrawal of the rejection of claims 1-3, 7-15, 18-26, 30-32, 34-37, and 41-46 under 35 U.S.C. §103(a) over US 6,054,061 to Bayes in view of US 5,861,076 to Adlam et al.

In view of the foregoing amendments and remarks, Applicants believe that the present application is in condition for allowance. Favorable consideration and allowance of claims 1-15, 17-32, and 34-46 are earnestly solicited.

Should the Examiner have any questions concerning this response or this application, or should he believe this application is for any reason not yet in condition for allowance, he is respectfully requested to telephone the undersigned at the number set forth below in order to expedite allowance of this application.

Respectfully submitted,

John J. Piskorski

Attorney for Applicants Registration No. 35,647

Shipley Company, L.L.C. 455 Forest Street

Marlborough, MA 01752

Telephone No.: Facsimile No.:

(508) 229-7662 (508) 787-4730